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May 2, 2022

BY CM/ECF

Magistrate Judge Katharine H. Parker United States District Court, For the Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007-1312

APPLICATION GRANTED

Hon. Katharine H. Parker, U.S.M.J.

05/02/2022

RE: Illinois Union Insurance Company v. Baruch Singer, et al. Case No. 21-cv-1170 (JPC)

Dear Magistrate Judge Parker:

We represent Plaintiff, Illinois Union Insurance Company ("Plaintiff"). Plaintiff and the defendants in this action respectfully request that the Court adjourn for 30 days the conference currently scheduled for May 6, 2022. The parties have reached a deal in principle and are in the process of exchanging for execution settlement documents. This action will be dismissed when the settlement terms are complied with and deliverables thereunder are provided. Counsel for the parties have been and are working cooperatively and are optimistic that the settlement documents will be fully executed shortly. Given the aforementioned status of this matter, including that the parties have reached a deal in principle, and because the parties seek to commit resources to resolving this matter without further court intervention, Plaintiff and defendants respectfully submit that there is good cause to adjourn the referenced conference.

We appreciate the Court's attention to this matter. Should the Court have any questions, comments or concerns, we are happy to make ourselves available at the Court's convenience.

Respectfully Submitted,

McElroy, Deutsch, Mulvaney & Carpenter, LLP

/s/ Michael R. Morano

Michael R. Morano

cc: Counsel of Record